Consumers Energy

A CMS Energy Company

1955 West Parnall Road
Jackson, MI 49201-8644

Tel: 517 788 0635
Fax: 517 788 1369

K. L. Elenbaas
Manager
Gas Operations Technical Support

June 22, 2000

Dockets Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

RE: Docket No. RSPA-99-6355
Pipeline Safety: Pipeline Integrity Management in High Consequence Areas

Consumers Energy Company serves more than 1.5 million customers in Michigan. We operate more than 23,000 miles of distribution main and more than 2,400 miles of transmission pipelines, as defined in 49 CFR 192.3. In 1999, we delivered 389 billion cubic feet of natural gas.

Although this proposed rulemaking applies only to hazardous liquid pipelines, we believe it is important to note that while the imposition of such rules would have a minor impact on hazardous liquid pipelines, similar rules would have a huge impact on natural gas pipelines.

As noted in the November 1992 Research and Special Programs Administration Study, entitled *Instrumented Internal Inspection Devices* (A Study Mandated by P.L. 100-561), unlike natural gas transmission lines, hazardous liquid pipelines are more likely to accommodate instrumented pigs because they are built to accommodate cleaning or batching pigs. The study notes that while only 10.5 percent of the hazardous liquid pipelines are not piggable, more than 41 percent of gas transmission lines are not piggable. That percentage increases significantly for gas transmission lines operated in conjunction with distribution systems. Quoting further, "The following factors make it impossible to pass an instrumented pig through a pipeline.

(a) Fittings in pipeline, such a pipe tees, that are not designed to prevent pigs from being stuck at these tees and short radius bends which cannot accommodate the length of an instrumented pig.

(b) Valves which are not of full opening type so that instrumented pigs can pass through.

(c) Variable internal diameters of a pipeline which prevent a pig from passing thorough the pipeline."

We would note that Consumers Energy operates approximately 600 miles of high pressure natural gas distribution mains that qualify as gas transmission pipelines per 49 CFR Part 192.3. The arbitrary imposition of the proposed hazardous liquid pipeline inspection requirements on these mains would result in extended periods of service interruption and inconvenience to many customers.

The natural gas regulations in 49 CFR 192 already have extensive pipeline integrity provisions that meet or exceed the provisions of this notice of proposed rulemaking for liquid lines. For example, ? 192.5 is a population density based pipeline integrity requirement that exceeds the analysis in the proposed rule.

The 1992 study estimated a cost of $2,677,306,018 to modify natural gas pipelines that cannot pass instrumented pigs. To add traps to the lines so modified would add another $1,086,095,568. Accordingly, we believe that any subsequent proposed rules that apply to natural gas pipelines be based on a rigorous cost/benefit analysis.

We appreciate the opportunity to provide comments on this docket.

KLElenbaas